TITLE V APPLICATION REVIEW

Project #: 960665 Deemed Complete: 1/15/97

Engineer: Beverly Boucher

Date: 11/13/97

Facility Number: C-996

Facility Name: The Earthgrains Baking Companies, Inc. - Fresno Bakery

Mailing Address: 160 "L" Street

Fresno, CA 93721-3192

Contact Name: Andy Glosier

Phone: (209) 233-5191

Responsible Official: Andy Glosier

Title: Plant Manager

I. PROPOSAL

The Earthgrains Baking Companies, Inc. - Fresno Bakery is proposing that an initial Title V Permit be issued for its existing bakery in Fresno, CA. The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with those applicable requirements, and to provide the legal and factual basis for proposed permit conditions.

II. FACILITY LOCATION

The Earthgrains Baking Companies, Inc. - Fresno Bakery is located at 160 "L" Street in Fresno, CA.

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III. EQUIPMENT LISTING

A detailed facility printout listing all permitted equipment at the facility is included as Attachment A.

A summary of exempt equipment categories which describes the insignificant activities or equipment at the facility not requiring a permit is shown in Attachment B. This equipment is not exempt from facility-wide requirements.

This facility consists of seven existing permitted units. Current Permits to Operate C-996-1-0, 2-0, 5-0, 6-0, 7-0, 8-0, and 9-0 are included as Attachment C.

IV. GENERAL PERMIT TEMPLATE USAGE

The applicant has chosen to not use any model general permit templates.

V. SCOPE OF EPA AND PUBLIC REVIEW

The applicant has not requested to utilize any model general permit templates. Therefore, all federally enforceable conditions in the proposed Operating Permit are subject to EPA and public review.

VI. APPLICABLE REQUIREMENTS NOT ADDRESSED BY GENERAL PERMIT TEMPLATES

District Rule 1100, Equipment Breakdown (as amended December 17,1992)

District Rule 1160, Emission Statements (as adopted November 18, 1992)

District Rule 2010, Permits Required (as amended December 17, 1992)

District Rule 2020, Exemptions (as amended July 21, 1994)

District Rule 2031, Transfer of Permits (as amended December 17, 1992)

District Rule 2040, <u>Applications</u> (as amended December 17, 1992)

District Rule 2070, Standards for Granting Applications (as amended December 17, 1992)

District Rule 2080, Conditional Approval (as amended December 17, 1992)

District New and Modified Stationary Source Review Rule

District Rule 2520, Federally Mandated Operating Permits, Sections 9.5.1, 9.5.2, 9.6.1, 9.6.2, 9.8, 9.9.1, 9.9.2, 9.9.3, 9.9.4, 9.9.5, 9.10, 9.13.1, 9.14.1, 9.14.2, 9.17, and 10.0 (adopted June 15, 1995)

District Rule 2520, Federally Mandated Operating Permits, Sections 9.1 and 9.4.2 (adopted June 15, 1995)

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District Rule 4101, <u>Visible Emissions</u> (as amended December 17, 1992)

District Rule 4201, Particulate Matter Concentration (as amended December 17, 1992)

District Rule 4202, <u>Particulate Matter - Emission Rate</u> (as amended December 17, 1992)

District Rule 4301¹, <u>Fuel Burning Equipment</u> (as amended December 17, 1992)

District Rule 4601, Architectural Coatings (as amended December 17, 1992)

District Rule 4621, <u>Gasoline Transfer Into Stationary Storage Containers</u>, <u>Delivery Vessels</u>, and <u>Bulk Plants</u> (as amended May 20, 1993)

District Rule 4622, Transfer of Gasoline Into Vehicle Fuel Tanks (as amended February 17, 1994)

District Rule 4801, Sulfur Compounds (as amended December 17, 1992)

District Rule 8020, 8030, and 8060, <u>Fugitive Dust (PM₁₀) Emissions</u> (as amended April 25, 1996)

40 CFR Part 61, Subpart M, National Emission Standard for Asbestos

40 CFR Part 82, Stratospheric Ozone, Subpart F

VII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

For each Title V source, the District issues a single permit that contains the Federally Enforceable requirements, as well as the District-only requirements. The District-only requirements are not a part of the Title V Operating Permits. The terms and conditions that are part of the facility's Title V permit are designated as "Federally Enforceable Through Title V Permit".

For this facility, condition 5 of the requirements for permit units C-996-1-1 and C-996-2-1, and conditions 2 and 4 of the requirements for permit units C-996-6-1, C-996-8-1, and C-996-9-1 are not Federally Enforceable through Title V.

VIII. COMPLIANCE

A. Requirements Addressed by Model General Permit Templates

The applicant has chosen to not use any general permit templates; therefore, no requirements are addressed by model general permit templates.

¹ This rule is not applicable to fuel burning equipment currently located at this facility. See discussion in Section VIII, Compliance.

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B. Requirements Not Addressed by Model General Permit Templates

1. District Rule 1100

Sections 6.0 and 7.0 set forth breakdown procedures and reporting requirements. These requirements are addressed by conditions 1, 2, and 11 of the facility-wide requirements (C-996-0-1). District Rule 1100 has been submitted to the EPA to replace Fresno County APCD Rule 110 which is in the SIP. District Rule 1100 is at least as stringent as the county SIP rule addressing breakdowns as is shown in the table below.

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Table 1. Comparison of District Rule 1100 and Fresno County Rule 110

Requirement	SJVUAPCD	FCAPCD
Report breakdown occurrence as soon as reasonably possible but no later than 1 hour after detection	X	X
Obtain variance if occurrence will last longer than a production run or 24 hours whichever is shorter (96 hours for CEM systems)	X	X
Submit a report to the APCO within 10 days of the correction of the breakdown occurrence which includes the following: 1) a statement that the breakdown condition has been corrected, together with the date of correction and proof of compliance, 2) a specific statement of the reason(s) or cause(s) for the occurrence sufficient to enable the APCO to determine whether the occurrence was a breakdown condition, 3) a description of the corrective measures undertaken and/or to be undertaken to avoid such an occurrence in the future, and 4) pictures of the equipment or controls which failed if available.	X	X

2. District Rule 1160

Section 5.0 requires the owner or operator of any stationary source to provide the District with a written emission statement showing actual emissions of reactive organic gases (ROGs) and nitrogen oxides (NO_x) from that source. See condition 3 of the facility-wide requirements (C-996-0-1).

3. District Rules 2010 and 2020

District Rule 2010 sections 3.0 and 4.0 require any person building, modifying or replacing any operation that may cause the issuance of air contaminants to apply for an Authority to Construct (ATC) from the District in advance. The ATC will remain in effect until the Permit to Operate (PTO) is granted. District Rule 2020 lists equipment which is specifically exempt from obtaining permits and specifies recordkeeping requirements to verify such exemptions. These requirements are stated in condition 4 of the facility-wide requirements (C-996-0-1).

District Rule 2010 has been submitted to the EPA to replace FCAPCD Rule 201 which is in the SIP. District Rule 2010 is as stringent as FCAPCD Rule 201 as is shown in the following table.

Table 2. Comparison of District Rule 2010 and Fresno County Rule 201

Requirement	SJVUAPCD	FCAPCD
Any person building or replacing equipment must apply for an Authority to Construct.	X	X
Any person altering equipment must apply for an Authority to Construct.	X	
Before operation, a Permit to Operate must be obtained.	X	X
A Permit to Operate must be posted on the equipment.	X	X

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Requirement	SJVUAPCD	FCAPCD
A person shall not willfully deface, alter, forge, counterfeit, or falsify a Permit to Operate.	X	X
The Authority to Construct shall serve as a temporary Permit to Operate for newly constructed or modified sources. The application for a Permit to Operate shall serve as a temporary Permit to Operate for existing sources that apply for a Permit to Operate.	X	

4. District Rules 2031, 2070 and 2080

These rules set forth requirements to comply with all conditions of the Permit to Operate. Permits to Operate or Authorities to Construct are not transferable unless a new application is filed with and approved by the District. All source operations must be constructed and operated as specified in the Authority to Construct. See conditions 5 and 6 of the facility-wide requirements (C-996-0-1).

District Rules 2031, 2070, and 2080 have been submitted to the EPA to replace FCAPCD Rules 203.1, 207, and 208 which are in the SIP. The District Rules are as stringent as the FCAPCD Rules as is shown in Tables 3, 4, and 5.

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Table 3. Comparison of District Rule 2031 and Fresno County Rule 203.1

Requirement	SJVUAPCD	FCAPCD
A PTO or an ATC shall not be transferable from location to location or from person to person unless a new application is filed and approved by the APCO.	X	X

Table 4. Comparison of District Rule 2070 and Fresno County Rule 207

Requirement	SJVUAPCD	FCAPCD
ATC or PTO applications shall be denied unless the applicant shows that Health and Safety Codes Section 41700, 41701, or 42301 are not violated.	X	
ATC or PTO applications shall be denied unless the applicant shows that Health and Safety Codes Section 41700 or 41701 are not violated.		X
PTO applications shall be denied unless the applicant follows the ATC.	X	X
ATC or PTO applications shall be denied unless the applicant complies with the NSR rule.	X	
ATC or PTO applications shall be denied unless the applicant will comply with both NSPS and NESHAP requirements.	X	
A person shall not operate any source operation contrary to conditions specified on the Permit to Operate.	X	

Table 5. Comparison of District Rule 2080 and Fresno County Rule 208

Requirement	SJVUAPCD	FCAPCD
The APCO may issue an ATC or PTO subject to conditions that shall be specified in writing.	X	X

5. District Rule 2040

Section 3.0 requires that every application for a permit shall be filed in a manner and form prescribed by the District. See condition 7 of the facility-wide requirements (C-996-0-1).

District Rule 2040 has been submitted to the EPA to replace FCAPCD Rule 204 which is in the SIP. District Rule 2040 is as stringent as FCAPCD Rule 204 as is shown in the following table.

Table 6. Comparison of District Rule 2040 and Fresno County Rule 204

Requirement	SJVUAPCD	FCAPCD
Every application for a permit shall be filed in the manner and form prescribed by the APCO and shall give all the information necessary to enable the APCO to determine whether to grant or deny a permit.	X	Х
The APCO shall notify the applicant in writing in the event of a denial. The applicant may deem the Permit to Operate denied if the APCO fails to act on the PTO within 60 calendar days after filing.	X	

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VUAPCD	FCAPCD
	VUAPCD

6. District Rule 2520, Sections 5.2, 9.0, and 10.0

Section 5.2 requires that permittees submit applications for Title V permit renewal at least six months prior to permit expiration. This requirement is included in condition 36 of the facility-wide requirements (C-996-0-1).

Section 9.0 of District Rule 2520 requires certain elements to be contained in each Title V permit:

Sections 9.5.1 and 9.5.2 contain requirements to incorporate all applicable recordkeeping requirements into the Title V permit, specific records of any required monitoring, and the retention of all required monitoring data and support information for five years. The requirements to keep specific monitoring records and retain records for five years are stated in conditions 8 and 9 of the facility-wide requirements (C-996-0-1), respectively.

Section 9.6 contains requirements for the submittal of reports of monitoring at least every six months and prompt reporting of deviations from permitting requirements, including those attributable to upset conditions. All required reports must be certified by the responsible official. These requirements are stated in conditions 10 and 11 of the facility-wide requirements (C-996-0-1).

Section 9.8 states that the Title V permit must also contain a severability clause in case of a court challenge; the severability clause is stated in condition 12 of the facility-wide requirements (C-996-0-1).

Section 9.9 contains requirements for provisions in the Title V permit stating that 1) the permittee must comply with all permit conditions; 2) that the permitted activity would have to be reduced to comply with the permit conditions should not be a defense in an enforcement action, 3) that the permit may be revoked, modified, reissued, or reopened for cause, 4) that the Title V permit does not reflect any property rights, and 5) that the permittee will furnish the District with any requested information to determine compliance with the conditions of the Title V permit. Compliance with these sections of Rule 2520 will be assured by conditions 5 and 13-16 of the facility-wide requirements (C-996-0-1).

Section 9.10 contains the requirement to provide in the permit that the permittee pay annual permit fees and applicable fees from District Rules 3010, 3030, 3050, 3080, 3090, 3110, and 3120. This requirement is stated in condition 17 of the facility-wide requirements (C-996-0-1).

Section 9.14.1 requires any report or document submitted under a permit requirement or a request for information by the District or EPA shall contain a certification by a responsible official to truth, accuracy, and completeness. Compliance with this section will be assured by condition 28 of the facility-wide requirements (C-996-0-1).

Section 9.14.2 contains inspection and entry requirements that allows an authorized representative of the District to enter a permittee's premises to inspect equipment,

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operations, work practices, permits on file, and to sample substances or monitor parameters for the purpose of assuring compliance with the permit requirements. Compliance with this section will be assured by conditions 18, 19, 20, and 21 of the facility-wide requirements (C-996-0-1).

Section 9.17 requires that the permittee submit certification of compliance with the terms and standards of Title V permits to the EPA and the District annually (or more frequently as required by the applicable requirement or the District). Condition 35 of the facility-wide requirements (C-996-0-1) assures compliance with this requirement.

Section 10.0 Requires any application form, report or compliance certification submitted pursuant to these regulations shall contain certification of truth accuracy, and completeness by a responsible official. Compliance with this section will be assured by condition 28 of the facility-wide requirements (C-996-0-1).

7. District Rule 4101

EPA issued a relative stringency finding, dated August 20,1996, stating District Rules 4101 is more stringent than SIP approved Fresno County Rule 401.

Section 5.0 of Rule 4101 prohibits the discharge of any air contaminant for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart; or is of such opacity as to obscure an observer's view to a degree equal to or greater than 20% opacity. This requirement is stated in condition 22 of the facility-wide requirements (C-996-0-1).

8. District Rule 4601

This rule limits the emissions of VOCs from architectural coatings. It requires limiting the application of coating to no more than 250 grams of VOC/liter of coating (less water and exempt compounds). It also forbids the use of coating from the list in the Table of Standards (section 5.2) and limits the use of Specialty Coatings to a VOC content not to exceed the specified limits in Table 1 of Rule 4601. This rule further specifies labeling requirements, coatings thinning recommendations, storage requirements and cleanup requirements. See conditions 23, 24, 25, 26, and 27 of the facility-wide requirements (C-996-0-1).

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9. District Rule 4002 - National Emissions Standards for Asbestos - 40 CFR Part 61.145, 61.150

There are applicable requirements from the National Emissions Standards for Hazardous Air Pollutants that apply to all sources in general. These requirements pertain to asbestos removal and disposal from renovated or demolished structures. Compliance is assured for these requirements by condition 34 of the facility-wide requirements (C-996-0-1).

10. Title VI of the CAA - Stratospheric Ozone

There are applicable requirements from Title VI of the CAA (Stratospheric Ozone) that apply to all sources in general. These requirements pertain to air conditioners, chillers and refrigerators located at a Title V source and to disposal of air conditioners or maintenance/recharging/disposal of motor vehicle air conditioners (MVAC). These requirements are addressed in conditions 29 and 30 of the facility-wide requirements (C-996-0-1).

11. SJVUAPCD Regulation VIII - Fugitive Dust (PM10)

These regulations contain requirements for the control of fugitive dust. These requirements apply to various sources: construction, demolition, excavation, extraction, and water mining activities; outdoor storage piles; paved and unpaved roads. Compliance with these regulations will be required by conditions 31, 32, and 33 of the facility-wide requirements (C-996-0-1).

12. District New and Modified Stationary Source Review Rule (NSR)

a. Pre-NSR Equipment

Permit units C-996-1-0, C-996-2-0, C-996-6-0, C-996-8-0, and C-996-9-0 were initially constructed in the period from 1944 to 1960 and have not been modified since that time. Therefore, these units are not subject to NSR requirements first established in 1977 in Fresno County.

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b. Post-NSR Equipment

Permit unit C-996-5-0, a 10,000 gallon underground gasoline storage tank with phase I vapor recovery and one dispensing nozzle with phase II vapor recovery, was subject to NSR at the time the applicant applied for the Authority-to-Construct (ATC) in February 1993. The ATC is not available in the file. However, the PTO can be used to determine which conditions were established to satisfy NSR. These conditions have been addressed in the following manner:

- Condition 1 of the PTO is included as condition 11 of the requirements for permit unit C-996-5-1.
- Condition 2 of the PTO is included as condition 14 of the requirements for permit unit C-996-5-1. Although the wording of this PTO condition has been changed in condition 14 to be consistent with template SJV-GS-1-0, the content has not changed. Condition 14 also incorporates other requirements from District Rule 4622 and the requirement from condition 3 of the PTO.
- Condition 3 of the PTO is included as condition 14 of the requirements for permit unit C-996-5-1. Although the wording of this PTO condition has been changed in condition 14 to be consistent with template SJV-GS-1-0, the content has not changed. Condition 14 also incorporates other requirements from District Rule 4622 and the requirement from condition 2 of the PTO.
- Condition 4 of the PTO is included as condition 12 of the requirements for permit unit C-996-5-1.

13. District Rule 2520, 9.1 and 9.4.2

Section 9.1 requires each permit to include emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of permit issuance.

Section 9.4.2 requires that periodic monitoring be performed if none is associated with a given emission limit to assure compliance. This section allows that recordkeeping requirements may be sufficient to meet these requirements.

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a. Bread oven and bun oven, C-996-1-0 and 2-0.

Compliance with District Rule 4201, 3.1 is assured by the operation and maintenance (O&M) requirements of condition 4 for permit units C-996-1-1 and C-996-2-1.

Compliance with particulate matter (PM) and SO_x emission limits will be demonstrated by fuel sulfur content testing, monitoring, and recordkeeping required by condition 3 of the requirements for permit units C-996-1-1 and C-996-2-1.

b. Gasoline storage and dispensing, C-996-5-0.

District Rule 4622 does not specify a monitoring frequency for the applicable leak detection requirement. Therefore, conditions #7 and #8 require annual leak inspections to be conducted and that the source maintain an inspection log to assure compliance with leak limits of the rule. District Rule 4622 prohibits operation with certain equipment defects, but does not require any monitoring. Condition #6 has been added to require a monitoring log of identified defects be maintained.

c. Flour transfer and storage, C-996-6-0, 7-0, 8-0, and 9-0.

Compliance with District Rule 4201, 3.1 is assured by the operation and maintenance (O&M) requirements of conditions 1 and 5 through 8 for permit units C-996-6-1, 7-1, 8-1, and 9-1.

14. District Rule 4201

EPA issued a relative stringency finding, dated August 20,1996, stating District Rule 4201 is more stringent than SIP approved Fresno County Rule 404.

Rule 4201 limits particulate matter emissions from any single source operation to 0.1 grains per cubic foot of gas at dry standard conditions.

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a. Bread oven and bun oven, C-996-1-0 and 2-0.

Compliance with this limit for natural gas fired ovens can be shown as follows:

$$\left(\frac{11.9 \ lb \ PM}{10^6 \ ft^3}\right) \left(\frac{1 \ MMBtu}{8710 \ dscf}\right) \left(\frac{1 \ scf}{900 \ Btu}\right) \left(\frac{7000 \ gr}{1 \ lb}\right) = 0.01 \frac{\text{grains}}{\text{dscf}} < 0.1 \frac{\text{grains}}{\text{dscf}}$$

where:

11.9
$$\frac{lb \cdot PM}{10^6 \cdot ft^3}$$
 = uncontrolled emission factor for natural gas fired boilers (AP-42, Table 1.4-1)

$$\frac{900 \, Btu}{scf}$$
 = the minimum expected higher heating value of natural gas (AP-42, 1.4.1)

$$\frac{8710 \ dscf}{MMBtu} = F \ factor, F_d, \ for \ natural \ gas \ (40CFR60, \ App. \ A, \ Method \ 19, \ Table$$

19-1)

$$\frac{7000 \ gr}{1 \ lb} = \text{conversion factor}$$

When the ovens are fired on number 2 fuel oil, compliance with this rule can be shown as follows:

$$\left(\frac{2 lb PM}{10^3 gal}\right)\left(\frac{1 gal}{139,600 Btu}\right)\left(\frac{1 MMBtu}{9190 dscf}\right)\left(\frac{7000 gr}{1 lb}\right) = 0.011 \frac{\text{grain}}{\text{dscf}} < 0.1 \frac{\text{grains}}{\text{dscf}}$$

where:

$$\frac{2 \ lb}{10^3 \ gal}$$
 = the emission factor for filterable PM, No. 2 fuel oil, (AP-42, Table 1.3-2)

$$\frac{139,600 Btu}{gal}$$
 = the typical heating value of No. 2 fuel oil (Perry's Handbook, Figure 9-9)

$$\frac{9190 \, dscf}{MMBtu} = F \, factor, F_d, for \, oil \, (40CFR60, App. \, A, \, Method \, 19, \, Table \, 19-1)$$

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Because compliance with the requirements of Rule 4201 are assured when firing on either natural gas or number 2 fuel oil, no testing will be required for these units when firing on approved fuels.

Conditions 1, 2, and 4 of the requirements for permit unit C-996-1-1 and 2-1 assure compliance with this rule. The use of number 2 fuel oil is a standby fuel as is listed on the Permit to Operate. Condition 3 of the requirements for permit unit sections C-996-1-1 and 2-1 requires the recordkeeping necessary to determine that only fuels that guarantee compliance with this rule are burned.

b. Flour Unloading System (C-996-6-0)

The following calculations demonstrate that the emission of PM for this unit comply with the limit of this rule.

$$\frac{(330,000 \ lb \ / \ day)(2.16 \ lb \ PM \ / \ ton)}{(2000 \ lb \ / \ ton)} = 356 \ lb \ PM \ / \ day$$

where:

330,000 lbs/day = process rate (from project #930226 January 12, 1994)
2.16 lb PM/ton = uncontrolled flour conveying emission factors (see Appendix D)

The above equation calculates the uncontrolled PM emissions from this unit. However, this unit is equipped with a cyclone that is vented to a sock filter. For the purposes of this evaluation it will be assumed that the efficiency of the control equipment is at least 99% efficient. Typically, fabric filter efficiency is greater than 99% (Reference: Buonicore and Davis, <u>AWMA Air Pollution Engineering Manual figure 2</u>, p. 115, Van Nostrand Reinhold, New York, 1992).

$$\frac{\left[(356 \, lbs \, / \, day)(1 - 0.99) \right] (7000 \, grains \, / \, lb)}{(1440 \, min / \, day)(400 \, dscf \, / \, min)} = 0.04 \, \frac{grains}{dscf} \, < \, 0.1 \, \frac{grains}{dscf}$$

where:

400 scfm = flow rate (District Engineering Evaluation for Project #930226, January 12, 1994)

The above equation demonstrates that the emissions of PM are expected to be well below the applicable limits. Thus no additional testing for PM will be required for this unit. Conditions 1 and 3 and monitoring requirements in conditions 5 through 8 of the requirements for permit unit C-996-6-1 assure compliance with District Rule 4201.

c. Flour Storage/Scaling System (C-996-7-0)

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The following calculations demonstrate that the emission of PM for this unit comply with the limit of this rule in a similar method as used above. (All definitions are the same as shown above.)

$$\frac{(330,000 \ lb \ / \ day)(2.16 \ lb \ PM \ / \ ton)}{(2000 \ lb \ / \ ton)} = 356 \ lb \ PM \ / \ day$$

$$\frac{\left[(356 \ lbs \ / \ day)(1 - 0.99) \right] (7000 \ grains \ / \ lb)}{(1440 \ min \ / \ day)(200 \ dscf \ / \ min)} = 0.087 \ \frac{grains}{dscf} < 0.1 \frac{grains}{dscf}$$

where:

200 scfm = flow rate (District Engineering Evaluation for Project #930226 January 12, 1994)

The above calculations demonstrate that the emissions of PM are expected to be below the applicable limits. Thus no additional testing for PM will be required for this unit. Conditions 1 and 3 and monitoring requirements in conditions 5 through 8 of the requirements for permit unit C-996-7-1 assure compliance with District Rule 4201.

d. Inside Flour System (C-996-8-0)

The following calculations demonstrate that the emission of PM for this unit comply with the limit of this rule in a similar method as used above. (All definitions are the same as shown above.)

$$\frac{(150,000 \ lb \ / \ day)(2.16 \ lb \ / \ ton)}{(2000 \ lb \ / \ ton)} = 162 \ lb \ PM \ / \ day$$

$$\frac{\left[(162 \ lbs \ / \ day)(1 - 0.99) \right] (7000 \ grains \ / \ lb)}{(1440 \ min \ / \ day)(400 \ dscf \ / \ min)} = 0.02 \frac{grains}{dscf} < 0.1 \frac{grains}{dscf}$$

where:

400 scfm = flow rate (District Engineering Evaluation for Project #930226 January 12, 1994)

The above equation demonstrates that the emissions of PM are expected to be well below the applicable limits. Thus no additional testing for PM will be required for this unit. Conditions 1 and 3 and monitoring requirements in conditions 5 through 8 of the requirements for permit unit C-996-8-1 assure compliance with District Rule 4201.

e. Inside Flour System (C-996-9-0)

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The following calculations demonstrate that the emission of PM for this unit comply with the limit of this rule in a similar method as used above. (All definitions are the same as shown above.)

$$\frac{(150,000 \ lb \ / \ day)(2.16 \ lb \ / \ ton)}{(2000 \ lb \ / \ ton)} = 162 \ lb \ PM \ / \ day$$

$$\frac{\left[(162 \ lbs \ / \ day)(1 - 0.99) \right] (7000 \ grains \ / \ lb)}{(1440 \ min \ / \ day)(360 \ dscf \ / \ min)} = 0.02 \frac{grains}{dscf} < 0.1 \frac{grains}{dscf}$$

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where:

360 scfm = flow rate (District Engineering Evaluation for project #930226 January 12, 1994)

The above calculations demonstrate that the emissions of PM are expected to be well below the applicable limits. Thus no additional testing for PM will be required for this unit. Conditions 1 and 3 and monitoring requirements in conditions 5 through 8 of the requirements for permit unit C-996-9-1 assure compliance with District Rule 4201.

15. District Rule 4202

EPA issued a relative stringency finding, dated August 20,1996, stating District Rule 4202 is more stringent than SIP approved Fresno County Rule 405.

District Rule 4202 applies to any source operation which emits particulate matter. The maximum allowable emission rate is given as a function of the process weight rate in section 4.0 of District Rule 4202. The function is shown below.

$$E = 3.59P^{0.62}$$

where: E = emission rate of particulate matter (lb/hr)P = process weight rate of flour (ton/hr)

The following calculations demonstrate that the emission of PM for this unit complies with the limit of this rule.

a. Flour Unloading System (C-996-6-0) and Flour Storage/Scaling System (C-996-7-0)

The emission limit is given by the following equation:

$$E = 3.59 \left(\frac{(330,000 \, lb \, / \, day)}{(2000 \, lb \, / \, ton)(24hr \, / \, day)} \right)^{0.62} = 11.9 \, lb \, PM \, / \, hr$$

The emission estimate from the device is below the above limit as demonstrated by the following equation:

$$\frac{(330,000 lb / day)(2.16 lb PM / ton)(1 - 0.99)}{(2000 lb / ton)(24hr / day)} = 0.15 lb PM / hr$$

where:

330,000 lbs/day = maximum process rate (from project #930226 January 12, 1994) 2.16 lb PM/ton = uncontrolled flour conveying emission factors (see Appendix D)

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0.99 = fabric filter PM control efficiency

The emission estimate showing compliance above is based on the maximum possible unloading rate of the equipment. Therefore, no testing or monitoring is required to show compliance with this requirement.

b. Inside Flour System, Bread Line (C-996-8-0) and Inside Flour System, Bun Line (C-996-9-0)

The emission limit is given by the following equation:

$$E = 3.59 \left(\frac{(150,000 \ lb / day)}{(2000 \ lb / ton)(24hr / day)} \right)^{0.62} = 7.3 \ lb \ PM / hr$$

The emission estimate from the device is below the above limit and is given by the following equation:

$$\frac{(150,000 lb / day)(2.16 lb PM / ton)(1 - 0.99)}{(2000 lb / ton)(24hr / day)} = 0.07 lb PM / hr$$

where:

150,000 lbs/day = process rate (from project #930226 January 12, 1994)
2.16 lb PM/ton = uncontrolled flour conveying emission factors (see Appendix
D)
0.99 = fabric filter PM control efficiency

The emission estimate showing compliance above is based on the maximum possible unloading rate of the equipment. Therefore, no testing or monitoring is required to show compliance with this requirement.

16. District Rule 4301

This rule limits emissions from fuel burning equipment. Section 3.1 of the rule defines Fuel Burning Equipment as, "any furnace, boiler, apparatus, stack, and all appurtenances thereto, used in the process of burning fuel for the primary purpose of producing heat or power by indirect heat transfer."

a. Bread oven and bun oven, C-996-1-0 and 2-0.

This rule does not apply because the ovens do not fit the definition of fuel burning equipment. This oven heats the bread products by direct heat transfer.

17. District Rule 4621

This rule applies to the transfer of gasoline into stationary storage tanks.

a. gasoline storage tank and dispensing nozzle, C-996-5-0.

Facility #: C-996 Project #: 960665 Subproject #: 970107

Section 5.1.1 of this rule requires that all stationary storage containers with a capacity greater than 250 gallons be equipped with a permanent submerged fill pipe and an ARB certified Phase I vapor recovery system, as defined in section 3.1 of the rule. Condition 1 of the requirements for permit unit C-996-5-1 assures compliance with this section.

Section 5.1.2 of this rule applies to above ground storage tanks. The tank at this facility is an underground tank, thus this requirement does not apply.

Section 5.2.1 prohibits the source from operating or allowing the operation of a gasoline delivery vessel unless valid State of California decals, which attest to the vapor integrity of the tank, are displayed. Condition 2 of the requirements for permit unit C-996-5-1 assures compliance with this section.

Section 5.2.2 of this rule applies to the loading of gasoline delivery vessels. Section, thus does not apply to this facility.

Section 5.3 of this rule applies to gasoline bulk plants, thus does not apply to this facility.

Section 5.4 of this rule requires that the vapor recovery system used to comply with the requirements of this rule shall comply with all safety, fire, weights and measures, and other applicable codes and/or regulations. This is a general "liability" clause which originated from the CARB Executive Orders certifying Phase I and II Vapor Recovery Systems. This requirement contains no airpollution related requirements that must be included in the permit.

Section 6.1 of this rule applies only to facilities required to provide recordkeeping which demonstrates their exemption from this rule. This section does not apply to this facility because it is not exempt from this rule.

Section 6.2 of this rule prescribes test methods that are to be used to demonstrate compliance with this rule. ARB Method 202 is required by District Rule 4621, section 6.2, for compliance with the vapor recovery requirements. This method is a certification procedure for gasoline bulk plants (where delivery vessels are being loaded with gasoline) and is not applicable to this gasoline dispensing facility where storage tanks are being filled by gasoline delivery vessels for later transfer to the end user. Compliance is assured with the vapor recovery requirements using performance tests required by District Rule 4622 in condition 14 of the requirements for permit unit C-996-5-1.

18. District Rule 4622

This rule applies to gasoline dispensing facilities that are not exempt due to a throughput of less than or equal to 24,000 gallons of gasoline per calendar year.

Facility #: C-996 Project #: 960665 Subproject #: 970107

a. gasoline storage tank and dispensing nozzle, C-996-5-0.

Although this facility has records that indicate a throughput of about 20,000 gallons of gasoline in 1995, it has chosen not to follow the recordkeeping requirements of section 6.1.1 and therefore may not claim exemption. The requirements of this rule are applicable as follows:

Section 5.1 of this rule requires that a Phase II vapor recovery system be operational on any gasoline dispenser used to fill a motor vehicle fuel tank with a capacity greater than five gallons. This facility has installed Phase II vapor recovery on the dispenser and complies with this rule. Condition 3 of the requirements for permit unit C-996-5-1 assures continued compliance with this rule.

Section 5.3 of this rule requires that any ARB certified gasoline vapor recovery system shall not be removed and shall be maintained in good repair so that the system can continue to comply with the certification recovery efficiency. Condition 4 of the requirements for permit unit C-996-5-1 assures compliance with this rule.

Section 5.4 of this rule requires that no person shall operate any fuel dispensing system that has a defective vapor recovery system. Refer to Attachment E for a list of these defects. Condition 5 of the requirements for permit unit C-996-5-1 assures compliance with this section.

Section 5.5 of this rule requires that the operator of any fuel dispensing system shall tag "Out of Order" on all dispensing equipment for which vapor recovery has been impaired. Condition 6 of the requirements for permit unit C-996-5-1 assures compliance with this section.

Section 5.6 of this rule requires that the vapor recovery system shall be maintained to have no leaks as determined by EPA Test Method 21. Conditions 7 and 8 of the requirements for permit unit C-996-5-1 assure compliance with this section.

Section 5.7 of this rule requires that the vapor recovery system used to comply with the requirements of this rule shall comply with all safety, fire, weights and measures, and other applicable codes and/or regulations. These requirements are identical to the requirements of section 5.4 of District Rule 4621 and contain no air-pollution related requirements that must be included in the permit.

Section 5.8 of this rule contains requirements for retail service stations, thus it does not apply to this facility.

Section 5.9 of this rule requires that no person top off a motor vehicle fuel tank. Condition 9 of the requirements for permit unit C-996-5-1 assures compliance with this section.

Section 5.10 of this rule applies to retail service stations, thus it does not apply to this facility.

Facility #: C-996 Project #: 960665 Subproject #: 970107

Section 5.11 of this rule requires that the owner of a vapor recovery system shall not tamper with or permit tampering with the system in a manner that would impair the operation or effectiveness of the system. Condition 10 of the requirements for permit unit C-996-5-1 assures compliance with this section.

Sections 6.1.1 and 6.1.2 apply to facilities that are exempt from this rule, thus these sections do not apply to this facility. Section 6.1.3 requires that records be maintained of vapor recovery system tests. Condition 15 of the requirements for permit unit C-996-5-1 assures compliance with this section.

Section 6.2 requires that the gasoline dispensing system be tested after major modification and installation and requires that the facility shall notify the District at least 15 days prior to any compliance testing. Conditions 12 and 13 of the requirements for permit unit C-996-5-1 assure compliance with this section.

Section 6.3 requires certain performance tests to be performed and passed to verify the compliance of the Phase II vapor recovery system. Condition 14 of the requirements for permit unit C-996-5-1 assures compliance with this section.

Facility #: C-996 Project #: 960665 Subproject #: 970107

19. District Rule 4801

This rule replaces Fresno County APCD Rule 406 and requires that sulfur compound emissions shall not exceed 0.2 percent by volume calculated as sulfur dioxide on a dry basis. The following table compares the stringency of these two rules and shows that the District Rule is as strict as Fresno County Rule 406.

Table 8. Comparison of District Rule 4801 and Fresno County Rule 406

Requirement	SJVUAPCD	FCAPCD
A person shall not discharge sulfur compounds into the atmosphere which would exceed 0.2 percent by volume calculated as sulfur dioxide.	X	X
EPA Method 8 and ARB Method 1-100 shall be used to determine such emissions.	X	

a. Bread oven and bun oven, C-996-1-0 and 2-0.

The following calculations determine the maximum fuel sulfur content that will result in compliance with District Rule 4801.

Assuming 0% excess air, the following chemical equation represents natural gas combustion (neglecting SO_X volume relative O_2 volume):

$$CH_4 + 2O_2 + 7.56N_2 + YS \rightarrow CO_2 + 2 H_2O + YSO_2 + 7.56N_2$$

where:

Y = moles of sulfur in the fuel.

Solving an expression for the fraction of SO₂ in the dry exhaust by volume gives:

$$\frac{Y}{1 + 7.56 + Y} = 0.002 \implies Y = 0.017$$

Facility #: C-996 Project #: 960665 Subproject #: 970107

where:

Y = maximum number of moles of sulfur per mole of CH₄ combusted

 $1 = \text{mole of CO}_2$ in exhaust

7.56 = number of moles of N_2 in exhaust

0.002 = 0.2% by volume limit per Rule 4801

Using the calculated value for maximum number of moles of sulfur per mole of CH₄ combusted one can determine the maximum weight fraction of sulfur in natural gas that will allow compliance with Rule 4801.

$$\frac{0.017*32.06}{16.04 + 0.017*32.06} = 0.033 \implies 3.3\%$$
 S by weight in the fuel

where:

32.06 = molecular weight of sulfur

 $16.04 = \text{molecular weight of CH}_4$

0.033 = maximum weight fraction of sulfur in natural gas

The preceding calculation shows that the maximum fuel sulfur content in natural gas that allows compliance with Rule 4801 is 3.3% by weight. The weight percent of sulfur in the fuel is proportional to the exhaust SO_2 concentration. The exhaust concentration associated with combustion of PUC quality natural gas with 0.017% sulfur is 0.001% SO_2 .; therefore, compliance with Rule 4801 is assured by condition 2 of the requirements for permit unit C-996-1-1 and 2-1 when the oven is fired on PUC quality natural gas.

Assuming 0% excess air, the following chemical equation represents number 2 fuel oil combustion (neglecting SO_x volume relative to O_2 volume):

$$C_{0.58}H + 0.83O_2 + 3.14N_2 + YS \rightarrow 0.58CO_2 + 0.5H_2O + YSO_2 + 3.14N_2$$

where:

 $C_{0.58}H$ is an approximate molar ratio for number 2 fuel oil based on the carbon to hydrogen mass ratio reported in Table 9-10 of Perry's Handbook.

Y = moles of sulfur in the fuel.

Solving the following expression for the fraction of SO_2 in the dry exhaust by volume gives:

$$\frac{Y}{0.58 + 3.14 + Y} = 0.002 \implies Y = 0.00745$$

where:

Y = maximum number of moles of sulfur per mole of $C_{0.58}H$ combusted

 $0.58 = \text{moles of CO}_2 \text{ in exhaust}$

3.14 = number of moles of N_2 in exhaust

Facility #: C-996 Project #: 960665 Subproject #: 970107

0.002 = 0.2% by volume limit per Rule 4801

Using the maximum number of moles of sulfur per mole of $C_{0.58}H$ combusted one can determine the maximum weight fraction of sulfur in natural gas that will allow compliance with Rule 4801.

$$\frac{0.00745*32.06}{7.974+0.00745*32.06} = 0.029 \Rightarrow 2.9\% \ \ \text{S by weight in the fuel}$$

where:

32.06 = molecular weight of sulfur (S)

 $7.974 = \text{molecular weight of C}_{0.58}\text{H}$

0.029 = maximum weight fraction of sulfur in number 2 fuel oil

The preceding calculation shows that the maximum fuel sulfur content in number 2 fuel oil that allows compliance with Rule 4801 is 2.9% by weight. The weight percent of sulfur in the fuel is proportional to the exhaust SO_2 concentration. The exhaust concentration associated with combustion of number 2 fuel oil with a sulfur content of 0.5% is 0.03% SO2; therefore, compliance with Rule 4801 is assured by condition 2 of the requirements for permit unit C-996-1-1 and 2-1 when the ovens are fired on number 2 fuel oil.

IX. PERMIT CONDITIONS

(see proposed permit, beginning on the next page)

ATTACHMENT A FACILITY EQUIPMENT LISTING

ATTACHMENT B

EXEMPT EQUIPMENT

Facility #: C-996 Project #: 960665 Subproject #: 970107

The following exempt equipment was identified by the applicant on TVFORM-003, Insignificant Activities.

Exemption Category	Rule 2020 Citation
Use of less than 2 gal/day of graphic arts materials.	5.4
Natural gas or LPG-fired boilers or other indirect heat transfer units of 5 MMBtu/hr or less.	5.1.1
Space heating equipment other than boilers.	5.1.4
Ovens at bakeries with total daily production less than 1,000 pounds and exempt by Section 5.1.1.	5.5.2
Containers ≤ 100 bbl used to store oil with specific gravity ≥ 0.8762 .	5.7.2
Fugitive emissions sources associated with exempt equipment.	5.10.3
Equipment used to apply architectural coatings.	5.9.1
Non-structural repairs & maintenance to permitted equipment.	4.2.6
Emissions less than 2 lb/day from units not included above.	4.2.1

ATTACHMENT C

EXISTING PERMITS TO OPERATE AND AUTHORITY TO CONSTRUCT

ATTACHMENT D

DETERMINATION OF PM EMISSION FACTOR

Facility #: C-996 Project #: 960665 Subproject #: 970107

I. <u>Introduction</u>

There is no emission data specifically on the transfer of flour. However, the emission factor for uncontrolled pneumatic loading of dry cement is 0.27 lb PM/ton (AP-42, Table 8-10-2, Fourth Edition, July 1993). This emission factor can be adjusted to obtain a reasonable factor for flour.

II. <u>Determination of Flour Emission Factor</u>

The motion of suspended particulate matter arises from the action of external forces. A suspended particle will move by force of gravity, and drag.

The particle settling and adhesion onto the control device walls are major removal mechanisms. The rate of particle settling is proportional to the terminal settling velocity, v_t , which takes into account drag and gravitational forces.

where

$$v_{t} = \underline{0.44 * dp^{2} * Dp * g}$$
18u

dp = particle diameter

Dp = particle density g = acceleration of gravity

u = viscosity of air

(The above is from John H. Seinfeld, <u>Atmospheric Chemistry and Physics of Air Pollution</u>, Stokes Law - pg 319, Wiley & Sons, 1986)

The ratio of settling velocities, v_{t, cement}/v_{t, flour}, is given by the ratio

$$(dp^2*Dp)_{cement}/(dp^2*Dp)_{flour}$$

where

 $Dp_{cement} = 94 \text{ lb/ft3}$ (AP-40, pg. 336)

 $dp_{cement} = 0.002$ inch (Perry's Chem Engr Handbook Fig 20-102)

Dp_{flour} = 47 lb/ft3 (Perry's Chem Engr Handbook Table 3-118)

 $dp_{flour} = 0.001$ inch (Perry's Chem Engr Handbook Fig 20-102)

$$V_{t, \text{ cement}}/V_{t, \text{ flour}} = (0.002^2 * 94)/(0.001^2 * 47) = 8$$

Flour settles 5 times more slowly than cement. Therefore, it is reasonable to estimate the flour emission factor to be 5 times that of cement loading or

 $8 \times 0.27 = 2.16 \text{ lb PM/ton.}$

ATTACHMENT E VAPOR RECOVERY SYSTEM DEFECTS

Facility #: C-996 Project #: 960665 Subproject #: 970107

Vapor Recovery System Defects from District Rule 4622 and California Code of Regulation, Title 17, Section 94006, pursuant to section 5.4 of District Rule 4622.

#	REQUIREMENTS	District Rule 4622	CCR, Title 17, §96004
1	Absence or disconnection of any component required to be used in the Executive Order(s) that certified the system.	X	X
2	A vapor hose which is crimped or flattened such that the vapor passage is blocked or the pressure drop through the vapor hose exceeds by a factor of two or more the requirements in the system certified in the Executive Order(s) applicable to the system.	X	X
3	A nozzle boot which is torn in one or more of the following manners: (1) Triangular-shaped or similar tear 1/2 inch or more to a side, or hole 1/2 inch or more in diameter, or (2) Slit 1 inch or more in length.	X	X
4	For balance nozzles and for nozzles for aspirator and eductor assist-type systems, faceplate or flexible cone that is damaged such that the ability to seal a fill pipe interface is affected for at least 1/4 of the circumference of the faceplate (accumulated).	X	X
5	More than 1/4 of the flexible cone missing from a nozzle on a vacuum-assist type system.	X	X
6	Nozzle shutoff mechanisms which malfunction in any manner.	X	X
7	Vapor return lines, including such components as swivels, anti-recirculation valves and underground piping, which malfunction or are blocked, or are restricted such that a pressure drop through the lines exceeds by a factor of two or more requirements specified in the Executive Order(s) that certified the system.	X	X
8	Vapor processing unit which is inoperative or severely malfunctioning.	X	X
9	Vacuum producing device which is inoperative or severely malfunctioning.	X	X
10	Pressure/vacuum relief valves, vapor check valves, or dry breaks which are inoperative.	X	X
11	Any equipment defect which is identified in an Executive Order certifying a system pursuant to the Certification Procedures incorporated in Section 94001 of Title 17, California Administrative Code, as substantially impairing the effectiveness of the system in reducing refueling vapor emissions.	X	X

ATTACHMENT F

EPA COMMENTS / DISTRICT RESPONSE

EPA COMMENTS / DISTRICT RESPONSE

The EPA's comment regarding the proposed Title V Operating Permit for Earthgrains bakery (District facility #C-996) is encapsulated below followed by the District's response. A copy of the EPA's 9/19/97 letter is available at the District.

1. EPA COMMENT

Earthgrains' flour transfer and storage permit units contain a 0.1 grain/dscf particulate matter emission limit and a 20% opacity limit. However, no stack testing is required and the permits do not provide for any operation and maintenance (O&M) to assure filter control efficiency.

DISTRICT RESPONSE

The District has discussed operation and filter maintenance currently being performed at Earthgrains. Earthgrains' current O&M was then discussed with EPA and found to be satisfactory to assure compliance with PM and opacity limits for permit units 6, 7, 8, and 9. The following conditions will be added as agreed, to the Earthgrains' Title V permit for these units:

- Dust collector filters shall be inspected daily while in operation for evidence of particulate matter breakthrough and replaced as needed. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- Dust collector filters shall be inspected at least weekly while not in operation for any tears, holes, abrasions, and scuffs which might interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- At least one spare set of dust collector filters shall be maintained on premises at all times. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- Records of dust collector inspections, maintenance, and repair shall be maintained. These records shall include identification of the dust collector, date of inspection, any corrective action taken as a result of inspection, and initials of the personnel performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

ATTACHMENT G

PUBLIC COMMENTS / DISTRICT RESPONSE

PUBLIC COMMENT / DISTRICT RESPONSE

Public comments were received from The Earthgrains Baking Companies, Inc. - Fresno Bakery regarding the proposed Title V Operating Permit for their baking facility (District facility #C-996). These comments are encapsulated below followed by the District's response. A copy of Earthgrains' 8/27/97 letter is available at the District.

General Comments:

1. EARTHGRAINS COMMENT

Earthgrains wishes to clarify that the facility will be issued only one Federally Mandated Operating Initial Permit. The "Notice of Preliminary Decision for this permit included reference to "permits" rather than "permit" in select areas.

DISTRICT RESPONSE

Originally, the District planned to issue an Initial Permit for each equipment unit at a source, similar to current District permitting practice. The District has revised this plan and will instead be issuing one Initial Permit for a facility, which will contain subsections for facility-wide requirements and requirements for each equipment unit. All future notices and correspondence regarding a Title V permit will reference a single permit.

2. EARTHGRAINS COMMENT

The name of the responsible official should be changed from Joseph Noelker to Andy Glosier (plant manager) on page 1 of the Title V Application Review.

DISTRICT RESPONSE

This correction will be made.

3. EARTHGRAINS COMMENT

In the second line on page 3 of the Title V Application Review, the District references "<u>District New and Modified Stationary Source Review Rule</u>". For clarity and consistency, Earthgrains feels this line should be revised as follows: "District Rule 2201, New and Modified Stationary Source Review Rule (as amended June 15, 1995)".

DISTRICT RESPONSE

The rule heading "<u>District New and Modified Stationary Source Review Rule</u>" is intended to include not only District Rule 2201 (as amended June 15, 1995, but also all previous District or County New Source Review (NSR) rules. For clarification, federally enforceable requirements include any term or condition of any preconstruction permit issued pursuant to regulations approved or promulgated through rulemaking under Title I, including parts C or D, of the Federal Clean Air Act (i.e. any term or condition of any Authority to Construct permit issued through NSR, and of any preconstruction permit issued through a Prevention of Significant Deterioration (PSD) program).

4. EARTHGRAINS COMMENT

In the last line on page 3 of the Title V Application Review, the District references "40 CFR Part 82, Subpart F, <u>Stratospheric Ozone</u>". 40 CFR Part 82 is titled "Protection of Stratospheric Ozone". 40 CFR Part 82, Subpart F is titled "Recycling and Emissions Reduction". Please review which are the appropriate applicable requirements addressed by general permit templates.

DISTRICT RESPONSE

General Permit Template SJV-UM-0-0 addressed 40 CFR Part 82, Subpart F. For clarification, the reference to the requirement you mention will be changed to "40 CFR Part 82, <u>Stratospheric Ozone</u>, Subpart F".

In the second paragraph of Section VII on page 4 of the Title V Application Review, the District refers to condition 5 of the requirements for permit units C-996-1-1 and -2-1. Review of the conditions for these permit units reveals condition 5 is not present. Please make the appropriate corrections.

DISTRICT RESPONSE

Condition 5 has been added to the requirements for permit units C-996-1-1 and -2-1. This is the general District public nuisance requirement, pursuant to District Rule 4102, and is not federally enforceable through Title V.

6. EARTHGRAINS COMMENT

In the second line of the last paragraph on page 9 (Section VIIB.6) of the Title V Application Review, the District uses the phrase "terms and standards". This phrase should be revised to read "terms and conditions", as worded in District Rule 2520, Section 9.17.

DISTRICT RESPONSE

The District believes the word "standards" has the same meaning as the word "conditions" in the referenced requirement. Furthermore, the current wording has been approved by EPA during its review period for the facility-wide template requirements. The District believes the meaning of the word "standards" is clear and it will not revise the wording as suggested.

7. EARTHGRAINS COMMENT

Section VIII.B.12 on page 11 of the Title V Application Review is titled "District New and Modified Stationary Source Review Rule". Earthgrains feels this title should be revised as follows: "District Rule 2201, New and Modified Stationary Source Review Rule (NSR)".

DISTRICT RESPONSE

Please refer to the District Response to Earthgrains Comment 3.

8. EARTHGRAINS COMMENT

In the second line of Section VIII.B.12 on page 11 of the Title V Application Review, the word "initially" has been spelled incorrectly as "initially".

DISTRICT RESPONSE

This typographical error has been corrected.

9. EARTHGRAINS COMMENT

In the second line of Section VIII.B.12.b on page 12 of the Title V Application Review, the word "and" should be inserted between the words "recovery" and "one".

DISTRICT RESPONSE

The word "and" has been inserted in this section as suggested.

10. EARTHGRAINS COMMENT

In Section VIII.B.14 on page 13 of the Title V Application Review, the District has used an uncontrolled emission factor of 13.7 lb $PM/10^6$ cf (from AP-42) for natural gas fired boiler units C-996-1 and -2. Review of AP-42, Table 1.4-1 indicates that the appropriate emission factor for these units is 11.9 lb $PM/10^6$ cf, since the heat input rating for both units is less than 10 MMBtu/hr.

DISTRICT RESPONSE

The District agrees with your comment and will the revise the emission factor used in its compliance demonstrations in Section VIII.B.14. The use of the revised emission factor has no affect the outcome of the compliance demonstration.

In Section VIII.B.14.b on page 15 of the Title V Application Review, "400 dsft" in the equation should be revised to "400 dscf".

DISTRICT RESPONSE

The District will correct this typographical error.

12. EARTHGRAINS COMMENT

The Title of Section VIII.B.15.a on page 19 of the Title V Application Review, is given as "Flour Unloading System (C-996-6-1) and Flour Storage/Scaling System (C-996-7-0). The modification number for unit -6 should be corrected to -0 in the title.

DISTRICT RESPONSE

The District will correct this typographical error.

The Title of Section VIII.B.15.b on page 19 of the Title V Application Review is given as "Flour Storage/Scaling System (C-996-8-0) and Inside Flour System (C-996-9-0)". The correct title should be "Inside Flour System (C-996-8-0) and Inside Flour System (C-996-9-0)".

DISTRICT RESPONSE

The District agrees the current title is incorrect and will revise the title as follows, to further distinguish between the two systems: "Inside Flour System, Bread Line (C-996-8-0) and Inside Flour System, Bun Line (C-996-9-0)".

14. EARTHGRAINS COMMENT

In Section IX on page 27 of the Title V Application Review, the District states Earthgrains did not request a permit shield. District Rule 2520 does not specify that the facility must request a permit shield at the time of permit application submittal. Therefore, Earthgrains is now requesting a permit shield and for the District to include conditions in accordance with District Rule 2520, 9.19 and 13.2.

DISTRICT RESPONSE

The District discussed this comment on 10/1/97 with Andy Glosier, plant manager for The Earthgrains Baking Companies, Inc. - Fresno Bakery. During the discussion, Earthgrains decided to withdraw its request for a permit shield, with the understanding that, in their specific situation, a permit shield would not result in any additional compliance benefit to them in the Title V permit.

15. EARTHGRAINS COMMENT

The name of the facility in the Facility Equipment Listing in Attachment A of the Title V Application Review is given as "Rainbo Bakery". The facility requests that its name be revised as "The Earthgrains Baking Companies, Inc. - Fresno Bakery" in all of the District's records.

DISTRICT RESPONSE

As discussed with Andy Glosier on 10/1/97, this "name change" request should be sent to Dave Warner, Permit Services Manager at the Central office of the SJVUAPCD. This request should be accompanied by a \$20.00 change of name fee, pursuant to District Rule 3010, Section 5.0. Please also be aware that the District permits database limits input to 31 characters (including spaces) for a company name.

16. EARTHGRAINS COMMENT

In Section I of Attachment D to the Title V Application Review, the District refers to AP-42, Table 8-10-2. The correct reference should be Table 11.12-2 of AP-42 (Fifth Edition, January 1995).

DISTRICT RESPONSE

This reference in this section is correct for the Fourth Edition of AP-42. The reference will be amended as follows: "AP-42, Table 8.10-2 (Fourth Edition, July 1993).

17. EARTHGRAINS COMMENT

In Section II of Attachment D to the Title V Application Review, the District uses the following calculation:

$$v_{t, cement}v_{t, flour} = (0.002^2 * 94)/(0.001^2 * 47) = 5$$

The result of the calculation is incorrect; the answer should be 8 instead of 5. The emission factor will therefore be equal to 2.16 lb PM/ton instead of 1.35 lb PM/ton, which has been used in the District's compliance analysis for Earthgrains. Earthgrains believes a controlled emission factor of 10 lb PM/million lb flour transferred is a representative emissions factor based on manufacturer's available data. Use of 2.16 lb PM/ton flour transferred uncontrolled emission factor, with 99% control also gives an emission factor of 10.8 lb PM/million lb flour transferred.

DISTRICT RESPONSE

The District has amended the compliance evaluation using the correct answer of 8, to the above equation. This revision has had no affect on the Title V permit condition content, since compliance with District rules has been demonstrated.

18. EARTHGRAINS COMMENT

In Section VIII.B.15.a on page 18 of the Title V Application Review, the District estimated PM emission to be 9.3 lb PM/hr. However it failed to take into account the 99% control efficiency that it had earlier used in calculations on pages 15-17. Earthgrains requests these calculations be revised.

DISTRICT RESPONSE

The District will revise the calculations using a 99% control efficiency to demonstrate compliance with District Rule 4202. This revision has had no affect on the Title V permit condition content.

19. EARTHGRAINS COMMENT

In Section VIII.B.15.b on page 19 of the Title V Application Review, the District estimated PM emission to be 4.2 lb PM/hr. However it failed to take into account the 99% control efficiency that it had earlier used in calculations on pages 15-17. Earthgrains requests these calculations be revised.

DISTRICT RESPONSE

Please refer to District Response to Earthgrains Comment 18.

The last column of the first row in the table in Attachment E to the Title V Application Review refers to CCR, Title 17 §96004, whereas the heading of the table on the same page refers to §96006. The citation needs to be the same at both places.

DISTRICT RESPONSE

The last column of the first row in the table in Attachment E to the Title V Application Review refers to CCR, Title 17 §96001, not §96004. Your assumption that the citation needs to be the same at both places is in error. The heading of the table refers correctly to CCR, Title 17 §96006, which contains a listing of vapor recovery system defects. This list of defects contains a reference to §96001, which is contained accordingly in the last column of the table in Attachment E. Section 96001 contains vapor recovery equipment certification procedures.

Comments on Specific Permit Conditions:

21. EARTHGRAINS COMMENT

In the forth line of condition 8 of the facility-wide requirements, the District should renumber the last monitoring record item as "6) the operating..." instead of "5) the operating...".

DISTRICT RESPONSE

This administrative correction in numbering will be made prior to issuance of the Title V permit.

22. EARTHGRAINS COMMENT

In condition 11 of the facility-wide requirements, the District had included the requirement that "all required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520. It appears that this certification requirement should be included in condition 10 instead of condition 11.

DISTRICT RESPONSE

Section 10.0 of District Rule 2520 requires that "Any ... report ... submitted pursuant to these [Title V] regulations shall contain certification of truth, accuracy, and completeness by a responsible official." This certification requirement is not restricted to monitoring reports. The District believes this requirement is appropriate as contained in condition 11 of the facility-wide requirements.

23. EARTHGRAINS COMMENT

In condition 13 of the facility-wide requirements, the District refers to "District Rule 2520, 9.9.1. It appears that Section 9.9.2 has been improperly numbered as Section 9.9.1 on page 22 of District Rule 2520. Earthgrains requests the District Rule be appropriately cited as "District Rule 9.9.2" in condition 13.

DISTRICT RESPONSE

The section numbering error you refer to concerning District Rule 2520 has been corrected in the rule. The citation of authority for condition 13 will be corrected to cite District Rule 2520, 9.9.2, prior to issuance of the Title V permit.

24. EARTHGRAINS COMMENT

In condition 35 of the facility-wide requirements, the District uses the phrase "terms and standards". This phrase should be revised to read "terms and conditions".

DISTRICT RESPONSE

The District believes the word "conditions" has the same meaning as the word "standards" in the referenced facility-wide requirement. Furthermore, the current wording has been approved by EPA during its review period for the facility-wide template requirements. The District believes the meaning of the requirement is clear and it will not revise the wording as you suggest.

In condition 33 of the facility-wide requirements, the District refers to October 10, 1993 as the construction date for applicability of affected roads, pursuant to District Rule 8060. The date is incorrect and should be changed to December 10, 1993, pursuant to District Rule 8060.

DISTRICT RESPONSE

The date referenced in condition 33 of the facility-wide requirements (C-996-0-0) will be corrected, prior to issuance of the Title V permit, to read "December 10, 1993", pursuant to District Rule 8060, Section 2.0, Applicability. This condition has also been administratively corrected in general permit template SJV-UM-0-0.

26. EARTHGRAINS COMMENT

In condition 11 for permit unit C-996-5-1, the District refers to "District Rule 4622, 5.1. Review of this rule indicates that a more appropriate citation will be "District Rule 4622, 5.3".

DISTRICT RESPONSE

The District believes the current citation of District Rule 4622, 5.1, as source of authority for this conditions is appropriate. The current citation for this condition has been approved by EPA during its review period for the general permit template SJV-GS-1-0.

27. EARTHGRAINS COMMENT

Condition 12 for permit unit C-996-5-1, requires that "the test results shall be submitted to the District no later than 30 days after each test." While Earthgrains does not have any objections to meeting this requirement, it wants to highlight that District Rule 4622, Section 6.1.3 only requires that the facility maintain the records of test results and does not require it to report them to the District. If appropriate, please revise condition 12.

DISTRICT RESPONSE

The District does not require source testing to demonstrate compliance with the 95% vapor recovery requirement for ARB certified systems. However performance testing is required to assure compliance, pursuant to District Rule 4622. The District routinely requires the results of these performance tests be submitted to the District within 30 days of the testing in order to effectively monitor source compliance. Please note this requirement is also on you current District permit C-996-5-0 as a result of NSR requirements to assure compliance with District rules. Condition 12 will not be revised.

28. EARTHGRAINS COMMENT

Condition 3 for permit units C-996-1-1 and -2-1 requires that the facility maintain daily natural gas and fuel oil consumption records. The facility requests this condition be modified to require the facility to maintain these records on a quarterly and annual basis, or at worst case on a monthly basis.

DISTRICT RESPONSE

This District agrees this condition should be modified to require the facility to maintain records of fuel consumption on a monthly basis, as required on Earthgrains' current District permits C-996-1-0 and -2-0. These units do not have daily emission limits (DELs) since they not been subject to NSR. Therefore, the requirement to maintain daily records will not provide any addition information with regards to compliance with the permit. Condition 3 for these units will be amended to require monthly monitoring of fuel consumption.

29. EARTHGRAINS COMMENT

In the first line of condition 2 for permit units C-996-1-1 and -2-1, "this unit" should be revised to read "these units".

DISTRICT RESPONSE

In condition 2, the phrase "this unit", referring to the oven, is appropriate. Each permit unit will have separate conditions in the resulting Title V permit with which it must comply. Therefore the bread and bun ovens will

each have their own separate set of conditions in the permit. For consistency, the forth line in condition 2 will be revised to read "The oven...."

30. EARTHGRAINS COMMENT

In condition 4 for permit units C-996-1-1 and -2-1, the District refers to District Rule 4201, 3.1. Review of this section indicates this citation may not be appropriate for condition 4.

DISTRICT RESPONSE

Condition 4 operation and maintenance (O&M) requirements assure compliance with District Rule 4201, 3.1. The District agrees that the citation for source authority is incorrect. The citation will be revised to read "District Rule 2520, 9.1", which requires limitations and operational requirements be included in the Title V permit that assure compliance with all applicable requirements.

31. EARTHGRAINS COMMENT

Condition 1 for permit units C-996-6-1 through -9-1, refers to District Rule 4201. Review of this rule indicates this citation may not be appropriate for condition 1.

DISTRICT RESPONSE

Please refer to the District Response to Earthgrains Comment 30.

32. EARTHGRAINS COMMENT

Condition 15 for permit unit C-996-5-1, requires that the results of all Dynamic Back-Pressure and Static Leak Test Procedure-Underground Tank tests shall be maintained. Earthgrains requests the District clearly specify the duration for which such records have to be maintained. A reasonable period for maintaining such records will be 5 years from the date of the tests.

DISTRICT RESPONSE

This requirement in condition 16 is derived from Section 6.1.3 of District Rule 4622. The District interprets this section to require the source maintain <u>all</u> records of such testing. There is no minimum time limit for maintaining such records.

33. EARTHGRAINS COMMENT

In the second line of condition 37 of the facility-wide requirements, "Permits" should be revised to "Permit".

DISTRICT RESPONSE

The District will correct this typographical error in the referenced condition prior to issuance of the Title V permit.

34. EARTHGRAINS COMMENT

Condition 2 for permit units C-996-6-1 through -9-1 refers to District Rule 4201. Review of this rule indicates this citation may not be appropriate for condition 2.

DISTRICT RESPONSE

Condition 2 requires material from dust collectors be disposed of in a manner preventing entrainment into the atmosphere. A more appropriate citation for source of authority for this requirement is District Rule 4102, Nuisance. The citation will be revised to read "District Rule 4102, 4.1".